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*Attorneys for Third-Party Defendant Zelaya Trucking LLC*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

HARTFORD FIRE INSURANCE  
COMPANY, a Connecticut corporation,  
individually and as subrogee for its insured,  
Stainless Steel Brakes Corp., a New York  
Corporation,

Plaintiff,

v.

3DL DESIGN, INC., an Illinois corporation;  
AIT WORLDWIDE LOGISTICS, INC.,  
d/b/a AIT FREIGHT SYSTEMS, an Illinois  
corporation; and DOES 1-10, inclusive,

Defendants.

AIT WORLDWIDE LOGISTICS, INC.,  
d/b/a AIT FREIGHT SYSTEMS, an Illinois  
corporation,

Cross-Claimant,

v.

Case No.: 2:17-cv-02937-GMS

**MOTION OF THIRD-PARTY  
DEFENDANT ZELAYA  
TRUCKING, LLC FOR LEAVE  
TO HAVE ITS *PRO HAC VICE*  
COUNSEL PARTICIPATE VIA  
TELEPHONE IN THE JULY 27,  
2018 STATUS CONFERENCE**

(The Honorable G. Murray Snow)

3DL DESIGN, INC., an Illinois Corporation,  
Cross-Defendant.

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AIT WORLDWIDE LOGISTICS, INC.,  
d/b/a AIT FREIGHT SYSTEMS, an Illinois  
corporation,  
Third-Party Plaintiff,

v.

AMERICAN LINEHAUL  
CORPORATION, a New Jersey corporation,  
ERIK RODRIGUEZ FUENTES, JANE  
DOE RODRIGUEZ FUENTES, husband  
and wife, ZELAYA TRUCKING, LLC, an  
Arizona limited liability corporation,

Third-Party Defendant.

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AMERICAN LINEHAUL  
CORPORATION, a New Jersey corporation,

Third-Party Defendant/  
Cross-Claimant,

v.

ZELAYA TRUCKING, LLC, an Arizona  
limited liability corporation,

Third-Party Defendant/  
Cross-Defendant.

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AMERICAN LINEHAUL  
CORPORATION, a New Jersey corporation,

Fourth-Party Plaintiff,

v.

UNITED XPRESS TRANSPORTATION  
LIMITED LIABILITY COMPANY, a New  
Jersey limited liability corporation,

Fourth-Party  
Defendant.

1 Pursuant to LRCiv 7.2(h), Third-Party Defendant Zelaya Trucking, LLC  
2 (“Zelaya”) respectfully moves for leave to have its *pro hac vice* counsel, Wesley S.  
3 Chused, appear via telephone at the Status Conference in this case scheduled for July  
4 27, 2018.

5  
6 As grounds for this Motion, Zelaya and its undersigned *pro hac vice* counsel,  
7 Wesley S. Chused, respectfully state that Attorney Chused is in Boston, MA. He is  
8 familiar with the claims, third-party claims and crossclaims against Zelaya, Zelaya’s  
9 defenses and its written discovery served to date (Responses to Mandatory Initial  
10 Discovery served May 18, 2018, Interrogatories and Requests for Production of  
11 Documents to Third-Party Plaintiff AIT Worldwide Logistics, Inc., served May 22,  
12 2018; and Zelaya’s Interrogatories and Requests for Production of Documents to Third-  
13 Party Plaintiff American Linehaul Corporation). Mr. Chused is familiar with the issues  
14 insofar as they pertain to Zelaya and expected to be discussed at the July 27, 2018  
15 Status Conference. Upon receipt of a dial-in phone number to the courtroom or  
16 chambers, Mr. Chused is prepared to do so at 9:30 a.m. (Phoenix time) on July 27, 2018  
17 and appear accordingly on behalf of Zelaya.

18  
19 Mr. Chused has circulated a draft of this Motion to counsel for all parties and no  
20 one has objected to it.

21  
22 WHEREFORE, Third-Party Defendant Zelaya Trucking, LLC respectfully  
23 requests leave pursuant to LRCiv 7.2(h) for its *pro hac vice* counsel, Wesley S. Chused,  
24 to participate in the July 27, 2018 Status Conference via telephone.  
25  
26

1  
2  
3 RESPECTFULLY SUBMITTED this 9<sup>th</sup> day of July, 2018.

4 ZELAYA TRUCKING, LLC

5 By its attorneys,

6 /s/ Wesley S. Chused

7 Wesley S. Chused, *pro hac vice*

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9 LLP

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14 and

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24  
25 **CERTIFICATE OF SERVICE**

26 I hereby certify that on July 9, 2018, I electronically transmitted the attached  
document to the Clerk's Office using the CM/ECF System for filing and served on  
counsel of record via the Court's CM/ECF system.

By: /s/ Wesley S. Chused

Wesley S. Chused